

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

FEE APPLICATION COVER SHEET FOR THE PERIOD
MAY 1, 2023 THROUGH MAY 31, 2023

Debtor: LTL Management LLC Applicant: Brown Rudnick LLP
Case No.: 23-12585 (MBK) Client: Official Comm of Talc Claimants I
Chapter: 11 Case Filed: April 4, 2023

SECTION 1
FEE SUMMARY

☒ Monthly Fee Application No. 2 or ☐ Interim Fee Application No. or ☐ Final Fee Application

Summary of Amounts Requested for the Period from May 1, 2023 through May 31, 2023
(the "Second Monthly Fee Statement")

Total Fees: \$3,008,593.00
Total Disbursements: \$49,266.37
Minus 20% holdback of Fees (\$601,718.60): \$2,406,874.40
Total Amount Sought To Be Paid at this Time: \$2,456,140.77

NAME OF PROFESSIONAL & TITLE	YEAR ADMITTED (Or Years of Professional Service)	HOURS	RATE	FEE
1. David J. Molton	Partner 1983	235.8	\$1,950	\$451,717.50
2. Jeffrey L. Jonas	Partner 1988	121.3	\$1,650	\$196,845.00
3. Michael S. Winograd	Partner 2001	325.0	\$1,280	\$416,000.00
4. Sunni P. Beville	Partner 2002	169.6	\$1,390	\$217,882.50
5. Cathrine M. Castaldi	Partner 1991	83.5	\$1,390	\$108,420.00
6. Vincent J. Guglielmotti	Partner 2005	.7	\$1,375	\$962.50
7. Eric R. Goodman	Partner 2003	226.00	\$1,325	\$283,947.50
8. Kenneth Aulet	Partner 2012	33.1	\$1,200	\$39,720.00
9. Nicole M. Bouchard	Partner 2009	24.7	\$1,200	\$29,640.00
10. Cameron D. Moxley	Partner 2005	161.9	\$1,105	\$178,899.50

NAME OF PROFESSIONAL & TITLE	YEAR ADMITTED (Or Years of Professional Service)	HOURS	RATE	FEE
11. Susan Sieger-Grimm	Counsel 1994	160.9	\$1,055	\$169,749.50
12. Tristan G. Axelrod	Partner 2015	3.8	\$1,000	\$3,800.00
13. Gerard T. Cicero	Partner 2015	164.5	\$1,000	\$164,500.00
14. Shari I. Dwoskin	Partner 2014	102.6	\$1,025	\$105,165.00
15. Michael W. Reining	Associate 2015	178.9	\$955	\$170,849.50
16. Tia C. Wallach	Partner 2013	6.9	\$955	\$6,589.50
17. Alexander F. Kasnetz	Associate 2018	35.3	\$890	\$31,417.00
18. Matthew A. Sawyer	Associate 2019	46.0	\$890	\$40,940.00
19. Reuben G. Gottlieb	Associate 2020	6.4	\$765	\$4,896.00
20. Jennifer M. Schein	Associate 2017	158.5	\$765	\$121,252.50
21. W. Lydell Benson, Jr.	Associate 2022	167.7	\$765	\$128,290.50
22. David Weinstein	Associate 2020	98.3	\$685	\$67,335.50
23. Harriet E. Cohen	Paralegal	72.3	\$490	\$35,427.00
24. Carlene M. Mercier	Paralegal	37.1	\$485	\$17,993.50
25. Susan G. Oldham	Paralegal	14.0	\$485	\$6,790.00
26. Madelyn A. Soliman	Paralegal	15.4	\$470	\$7,238.00
27. Jasnoor Hundal	Summer Associate	5.0	\$465	\$2,325.00
TOTALS		2,655.2		\$3,008,593.00

Fee Totals: \$3,008,593.00

Disbursements Totals: \$49,266.37

Total Fee Application \$3,057,859.37

**SECTION II SUMMARY
OF SERVICES**

SERVICES RENDERED	HOURS	FEE
a) Asset Analysis and Recovery: Identification and review of potential assets including causes of action and non-litigation recoveries.	0.0	\$0.00
b) Asset Disposition Sales, leases, abandonment and related transaction work.	0.0	\$0.00
c) Avoidance Action Litigation Preference and fraudulent transfer litigation.	0.0	\$0.00
d) Business Operations Issues related to debtor-in-possession operating in chapter 11 such as employee, vendor, tenant issues and other similar problems.	0.0	\$0.00
e) Case Administration Coordination and compliance activities, including review of statement of financial affairs, schedules, list of contracts, United States Trustee interim statements and operating reports; contacts with the United States Trustee; general creditor inquiries.	33.0	\$19,198.50
f) Claims Administration and Objections Specific claim inquiries; bar date motions; analyses, objections and allowance of claims.	1.2	\$2,228.00
g) Employee Benefits/Pensions Review issues such as severance, retention, 401K coverage and continuance of pension plan.	0.0	\$0.00
h) Fee/Employment Applications Preparations of employment and fee applications for self or others; motions to Establish interim procedures.	18.9	\$18,556.00
i) Fee/Employment Objections Review of an objections to the employment and fee applications of others.	4.0	\$5,896.00
j) Financing Matters under 361, 363 and 364 including cash collateral and secured claims; loan document analysis.	0.0	\$0.00
k) Litigation General litigation and other contested matters.	1,030.4	\$1,140,240.50
l) Meetings of Creditors Preparing for and attending the conference of creditors, the 341 meeting and creditors' committee meetings.	191.1	\$259,168.00
m) Plan and Disclosure Statement Formulation, analysis, presentation, and confirmation; compliance with the plan confirmation order, related orders and rules; disbursement and case closing activities, except those related to allowance and objections to allowance of claims.	294.8	\$363,773.00

SERVICES RENDERED	HOURS	FEE
n) Relief from Stay Proceedings / Injunction Litigation in Adversary Proceeding Matters relating to termination or continuation of automatic stay under sections 362 and 105; matters relating to preliminary injunction and related appeals.	73.4	\$92,259.50
o) Accounting/Auditing Activities related to maintaining and auditing books of account, preparation of financial statements and account analysis.	0.0	\$0.00
p) Business Analysis Preparation and review of company business plan; development and review of strategies; preparation and review of cash flow forecasts and feasibility studies.	0.0	\$0.00
q) Corporate Finance Review financial aspects of potential mergers, acquisitions and disposition of company or subsidiaries.	0.0	\$0.00
r) Data Analysis Management information systems review, installation and analysis, construction, maintenance and reporting of significant case financial data, lease rejection, claims, etc.	0.0	\$0.00
s) Litigation Consulting Providing consulting and expert witness services related to various bankruptcy matters such as insolvency, feasibility, avoiding actions; forensic accounting, etc.	0.0	\$0.00
t) Reconstruction Accounting Reconstructing books and records from past transactions and bringing accounting current.	0.0	\$0.00
u) Tax Issues Analysis of tax issues and preparation of state and federal tax returns.	0.0	\$0.00
v) Valuation Appraise or review appraisals of assets.	0.0	\$0.00
w) Travel Time (billed @ 50%)	72.4	\$52,401.50
x) Committee Governance Matters Analysis regarding committee governance matters, including creation of by laws and addressing other governance matters.	4.5	\$5,183.00
y) Investigation and Due Diligence Investigation and analysis of prepetition transactions and activities of the Debtor and related entities and assessment of potential claims and causes of action.	0.0	\$0.00
z) Hearings Preparation for and attendance at hearings.	157.3	\$196,189.00
aa) Mediation Preparation for and attendance at mediation.	27.5	\$51,722.00
bb) Dismissal / Trustee / Examiner Matters Issues relating to motions to dismiss, motions to appoint an examiner or trustee, and related appeals as applicable.	691.6	\$729,702.00

SERVICES RENDERED	HOURS	FEE
cc) Meetings of Co-Counsel Preparing for and attendance at meetings of co-counsel and other TCC professionals to develop case strategy, coordinate actions items and prepare in advance of full committee meetings.	55.1	\$72,076.00
SERVICE TOTALS:	2,655.2	\$3,008,593.00

**SECTION III
SUMMARY OF DISBURSEMENTS**

DISBURSEMENTS	AMOUNT
a) Filing Fees Payable to Clerk of Court.	\$0.00
b) Computer Assisted Legal Research Westlaw, Lexis and a description of manner calculated. Westlaw and LEXIS at vendor cost.	\$5,538.00
c) Pacer Fees Payable to the Pacer Service Center for search and/or print.	\$126.80
d) Fax Include per page fee charged.	\$0.00
e) Case Specific Telephone/Conference Call Charges Exclusive of overhead charges.	\$0.00
f) In-house Reproduction Services Exclusive of overhead charges.	\$1,356.20
g) Outside Reproduction Services Including scanning services.	\$3,807.17
h) Other Research Title searches, UCC searches, Asset searches, Accurint.	\$0.00
i) Court Reporting Transcripts.	\$9,935.36
j) Travel Mileage, tolls, airfare, parking.	\$10,452.80
k) Courier & Express Carriers Overnight and personal delivery.	\$274.89
l) Postage	\$0.00
m) Other (specify) Meals Overtime Meals.	\$1,947.74
p) Other (specify) Expert Fees.	\$15,827.41
DISBURSEMENTS TOTAL:	\$49,266.37

I certify under penalty of perjury that the above is true.

Date: June 22, 2023

/s/ Sunni P. Beville

BROWN RUDNICK LLP ("Brown Rudnick") submits this Second Monthly Fee Statement of Brown Rudnick LLP for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Co-Counsel for The Official Committee of Talc Claimants for the Period from May 1, 2023 through May 31, 2023 ("Second Monthly Fee Statement"), pursuant to the Order Establishing Procedures for the Allowance of Interim Compensation and Reimbursement of Expenses of Retained Professionals entered on May 22, 2023 [Docket No. 562] (the "Interim Compensation Order").

WHEREFORE, Brown Rudnick respectfully requests payment of fees for the Second Monthly Fee Statement in the sum of \$2,406,874.40, together with expenses of \$49,266.37, for a total requested payment of \$2,456,140.77, in accordance with the terms of the Interim Compensation Order.

Dated: June 22, 2023

BROWN RUDNICK LLP
*Co-Counsel to the Official Committee
of Talc Claimants*

By: /s/ Sunni P. Beville
SUNNI P. BEVILLE